

May 19, 2016

Cynthia Giles (2201A) Assistant Administrator for Enforcement and Compliance Assurance U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Re: Status of Vehicles Converted to Dedicated Competition Use

Dear Ms. Giles:

On behalf of ACCUS' member clubs (NASCAR, NHRA, IndyCar, IMSA, SCCA and USAC), thank you for your letter of May 13 in which you respond to our inquiries concerning the regulatory status of certified production on-road vehicles that are converted to competition vehicles. Thank you also for the engagement of your staff on this issue in such a collaborative and constructive manner.

We are glad to hear that EPA does not wish to interfere with the process of modifying these vehicles and then using them solely for sanctioned competition events. As you point out, there exists a long-standing tradition of permanently converting certified production vehicles to competition vehicles, and we are pleased that EPA currently has no intention of prohibiting this practice. While we remain interested in a more permanent solution that does not depend on the Agency's exercise of enforcement discretion, your letter certainly helps to allay the fears of many of our club members.

We strongly support the Agency's efforts to regulate any attempts to illegally bypass or defeat emission control devices on public road vehicles and we appreciate your and your staff's efforts to clarify the status of vehicles legitimately converted to competition use.

Sincerely,

Nicholas W. Craw President & CEO